

# **EXHIBIT 4**

## Summary of Allegations in Consolidated Action Against Defendant Prince Turki al Faisal al Saud

Allegation (A)									
Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., No. 1:02CV6977 (S.D.N.Y. Sept. 4, 2002)	Walter Tremsky, et al. v. Osama bin Laden, et al., No. 1:02CV7300 (S.D.N.Y. Sept. 11, 2002)	Gladys Salvo, et al. v. Al Qaeda Islamic Army, et al., No. 1:03CV5071 (S.D.N.Y. July 8, 2003)	Chiem York, et al. v. Al Qaeda Islamic Army, et al., No. 1:03CV5493 (S.D.N.Y. July 24, 2003)	Burnett, et al. v. Al Baraka Inv. and Dev. Corp., et al., No. 1:03CV5738 (S.D.N.Y. Aug. 1, 2003)	Ernesto Barrera, et al. v. Al Qaida Islamic Army, et al., No. 1:03CV7036 (S.D.N.Y. Sept. 10, 2003)	Burnett, et al. v. Al Baraka Inv. and Dev. Corp., et al., No. 1:03CV9849 (S.D.N.Y. Dec. 12, 2003)	[Dismissed]		
(B)	(B)	(B)	(B)	(B)	(B)	(B)	(B)	(B)	(C)
241	--	278	--	376	243	376	--	376	
250	--	242	130	--	252	--	--	--	
252	180	244	131	339	254	339			339
253	180	245	132	340	255				340

"Evidence recovered by the Spanish authorities shows that Muhammed Galeb Kalaje Zouaydi, a Syrian born businessman, along with several associates in Spain and Europe, funneled money from the Saudi-based company, Mushayt for Trading Establishment (or "Mushayt"), through Spanish corporations to entities and individuals known to be associated with the al Qaeda terrorist organization in Europe. Prince Abdullah al Faisal bin Abdulaziz al Saud is implicated in these financial transactions of material support to al Qaeda, as is Prince Turki al Faisal al Saud."

"[T]here where and are, a large number of Saudi citizens and members of the Saudi Royal Family who support bin Laden. High-ranking officials in the Saudi government and Saudi businessmen have provided money to support bin Laden and al Qaeda. Money to support bin Laden and al Qaeda was transferred using charitable institutions, businesses and banks. In many cases, these entities shared management and or offices, creating an interlocking financing structure that obscures the movement, source and ultimate destination of money."

"The close relationship between Osama Bin Laden and certain of the highest members of the Saudi royal family stretches back for a long period of time and continues to this day."

"Osama bin Laden met with Defendant Sultan bin Abdullah al Saud (or "Prince Sultan") after Iraq invaded Kuwait in August 1990. Prince Sultan is the Second Deputy Prime Minister, Minister of Defense and Aviation, Inspector General, and Chairman of the Board of Saudi Arabian Airlines, which does business in the United States and internationally. In the meeting, Osama bin Laden offered the engineering equipment available from his family's construction company and suggested bolstering Saudi forces with Saudi militants who bin Laden was willing to recruit."

(A) Allegations are quoted from the Ashton complaint (No. 1:02CV6977)

(B) Reference numbers are to paragraph numbers in complaint

(C) Dismissed by Judge Robertson; transferred from D.D.C.

## Summary of Allegations in Consolidated Action Against Defendant Prince Turki al Faisal al Saud

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	(B)	(B)	(B)	(B)	(B)	(B)	(B), (C)
	254	180	246	133	341	256	341
	256	185	248	--	343	258	343
	257	182	249	134	344	259	344
	258	--	250	--	345, 516	260	345, 516
	259	--	251	--	346	261	346

"This offer was also made to Defendant Prince Turki al Faisal al Saud (or "Prince Turki"), the then Chief of Saudi Intelligence, or Istakhbarat. Prince Turki had an ongoing relationship with Osama bin Laden from the time that they first met in Islamabad, Pakistan at the Saudi embassy, during the Soviet Union's occupation of Afghanistan."

"Prince Turki was head of Saudi Arabia's Department of General Intelligence (Istakhbarat) from 1977 until 2001. As such, he was in a position to know the threat posed by bin Laden, al Qaeda, the Taliban, and the extremist and violent perversion of jihad and hatred that the Saudi religious schools were encouraging in young people. Prince Turki abruptly left his position in or around August 30, 2001, when he was dismissed as chief of Saudi Intelligence just prior to the September 11, 2001 attacks."

"Prince Turki met personally with bin Laden at least five times while in Pakistan and Afghanistan during the mid-eighties to mid-nineties. Prince Turki also had meetings with the Taliban in 1998 and 1999. In 1995, while the Saudi Istakhbarat was headed by Prince Turki, he decided to give massive financial and material support to the Taliban."

"Defendants Prince Turki al Faisal al Saud and Prince Mohammed had close financial ties with al Qaeda financier Muhammed Galeb Kalaje Zouaydi."

"Mullah Kakshar is a senior Taliban official who defected and provided a sworn statement regarding the transfer of funds from wealthy Saudis directly to al Qaeda and bin Laden in Afghanistan. Mullah Kakshar's sworn statement implicates Prince Turki as the facilitator of these money transfers in support of the Taliban, al Qaeda, and international terrorism."

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## Summary of Allegations in Consolidated Action Against Defendant Prince Turki al Faisal al Saud

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	(B)	(B)	(B)	(B)	(B)	(B)	(B), (C)	
	260	183	252	135	347	262	347	347
	261	184	253	136	348	263	348	348
	262	186	254	138	349	264	349	349
	263	185	255	137	350	265	350	350
	288	--	283	--	381	290	381	381

"In 1996, according to various intelligence sources, a group of Saudi princes and prominent Saudi business leaders met in Paris and agreed to continue contributing, sponsoring, aiding and abetting bin Laden's terrorist network."

"In July of 1998, a meeting occurred in Kandahar, Afghanistan that led to an agreement between certain Saudis and the Taliban. The participants were Prince Turki, the Taliban leaders, as well as senior Pakistani intelligence officers of the ISI and representatives of bin Laden. The agreement reached stipulated that bin Laden and his followers would not use the infrastructure in Afghanistan to subvert the royal family's control of Saudi government and in return, the Saudis would make sure that no demands would be acceded to for the extradition of terrorist individuals, such as bin Laden, nor permit the closure of terrorist facilities and camps. Prince Turki also promised to provide oil and generous financial assistance to both the Taliban in Afghanistan and to Pakistan. After the meeting, 400 new pick-up trucks arrived in Kandahar for the Taliban, still bearing Dubai license plates."

"Prince Turki was instrumental in arranging a meeting in Kandahar between Iraqi senior intelligence operative, the Ambassador to Turkey Faruq al-Hijazi and Osama bin Laden, in December of 1998."

"Istakhbarat served as a facilitator of Osama bin Laden's network of charities, foundations, and other funding sources. Prince Turki has recently been named as an ambassador from Saudi Arabia to the United Kingdom."

"As with Prince Sultan and Prince Turki, Prince Nayef has engaged in material support, including but not limited to monetary payoffs, to Osama bin Laden's al Qaeda."

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	296	187	326	--	431	298	391	431
	--	--	--	--	391	--	--	391

"Certain members of the Saudi Royal family and related persons overtly and covertly aid, abet, and support the IIRO and other charities, despite their roles in terrorist financing. Certain members of the Saudi Royal family, along with other wealthy Saudi supporters, contributed to the IIRO and related charities as a way to support al Qaeda without suffering from the social (and legal) ramifications that such contributions bring. The IIRO receives funds which are passed on to terrorists from the Zakat payments from individuals and companies in the kingdom of Saudi Arabia. The Saudi Royal family members own substantial assets in the United States of America, and do substantial business in the United States of America, the profits of which in part, are used to fund international terrorist acts, including those which led to the murderous attacks of September 11, 2001."

"Prince Turki served in the same cabinet as Chief of Intelligence, which shared information with al Turki. It was widely known that al Qaeda members' and supporters' interpretation of the Koran provides that suicide bombing is a permissible act, and that al Qaeda's political goal is to establish global extremist Muslim rule. For al Qaeda and some extremist Saudi supporters, support of the Taliban may have had less to do with Afghanistan's autonomy and much more to do with funding a staging platform and material sponsorship for worldwide global jihad."

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